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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**
12

13 In re
14 PG&E CORPORATION
15
16 and
17 PACIFIC GAS AND ELECTRIC
18 COMPANY,
Debtors.

Case Nos. 19-30088 DM (Lead Case)
19-30089 DM

Chapter 11
Jointly Administered

19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors
22 * All papers shall be filed in the Lead Case
23 No. 19-30088 DM.
24
25

Date: May 9, 2019
Time: 9:30 a.m.
Place: Courtroom 17
450 Golden Gate Avenue
San Francisco, California

OBJECTION DEADLINE: April 24, 2019
DKT #1324

26 **DECLARATION OF COUNSEL IN SUPPORT OF EX PARTE APPLICATION BY TURN**
27 **TO MODIFY PAGE LIMIT FOR REPLY TO OPPOSITIONS TO MOTION BY TURN FOR**
28 **APPOINTMENT OF OFFICIAL COMMITTEE OF RATEPAYER CLAIMANTS**
PURSUANT TO 11 U.S.C. §§ 1102(a)(2), 105(a)

1 I, Robert G. Harris, know the following matters to be true of my own, personal knowledge
2 and, if called as a witness, I could and would testify competently thereto:

3 1. I am a member of the State Bar of California in good standing and am admitted to
4 practice before this Court. I am counsel for e Utility Reform Network (“TURN”).

5 2. On May 2, 2019, I transmitted email messages to Timothy Laffredi, Dennis Dunne,
6 and Jane Kim, counsel for the U.S. Trustee, Official Committee of Unsecured Creditors, and Debtors
7 herein, respectively. My message was as follows: “Dear counsel: My reply brief on the Motion to
8 Compel Appointment of a Ratepayer Committee is oversize. Will you stipulate to my application to
9 modify BLR 9013-1 to allow me to file a 21-page brief?” I called and left messages for Ms. Kim (in
10 her firm’s general mailbox) and Mr. Dunne.

11 3. Mr. Laffredi replied to me by email almost immediately stating the following:
12 “Thanks, Mr. Harris. The UST does not have any objection to your request to file an oversized
13 brief.” I have not received responses from Mr. Dunne or Ms. Kim as yet.

14 I declare under penalty of perjury of the laws of the United States that the foregoing is true
15 and correct. Executed this 2nd day of May, 2019, at Santa Clara, California.

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17 /s/ Robert G. Harris
18 Robert G. Harris
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